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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

HIGH SIERRA HIKERS ASSOCIATION,  
  
Plaintiff,  
  
v.  
  
UNITED STATES DEPARTMENT OF THE  
INTERIOR, et al.,  
  
Defendants.

Case No. CV-09-4621-RS

JOINT STIPULATION TO  
REVISE BRIEFING SCHEDULE  
AND PROPOSED ORDER

JUDGE: HONORABLE  
RICHARD SEEBORG

Courtroom: 3, 17th Floor

1  
2 WHEREAS, on October 26, 2012, the Plaintiff High Sierra Hikers Association filed a  
3 Motion for Attorneys' Fees, Costs, and Other Expenses Pursuant to 28 U.S.C. § 2412,

4 WHEREAS, Plaintiff and Defendants United States of the Interior, et al., have been  
5 engaged in settlement discussions with respect to the Plaintiff's motion and are interested in  
6 continuing settlement discussions that, if successful, would avoid the need for a hearing;

7 WHEREAS, at Defendants' request, the Court previously continued the date for the  
8 Defendants to file their opposition to the fee motion until December 11, 2012;

9 WHEREAS, the parties now have reached an agreement-in-principle regarding a possible  
10 settlement of the Plaintiff's motion, but require additional time to reach agreement on the specific  
11 terms and conditions of the proposed settlement, as well as time for formal approval by officials  
12 in the Department of the Interior and Department of Justice,

13 NOW THEREFORE, IT IS HEREBY STIPULATED and agreed between the Parties that:

14 1. The date for the Defendants' to file their opposition to Plaintiff's Motion shall be  
15 continued by an additional 30 days, until **January 10, 2013**, to allow time for further settlement  
16 discussions and review of any settlement agreement by both parties.

17 2. The parties shall advise the Court of the status their settlement discussions in a joint  
18 status report to be filed on or before **January 4, 2013**.

19 3. The hearing on Plaintiff's Motion is continued until a date to be set following the joint  
20 status report on **January 4, 2013**. If settlement does not appear imminent at that time, the parties  
21 will agree on a date for the Plaintiff's Reply and request a hearing on Plaintiff's Motion at the  
22 next available date on the Court's calendar.

23 **IT IS SO STIPULATED.**  
24  
25  
26  
27  
28

1  
2 In addition to stipulating to the above, I, Charles R. Shockey, attest that concurrence in the  
3 filing of this Stipulation has been obtained from Barbara N. Barath, Attorney for Plaintiff.

4 Dated: December 4, 2012

BARBARA N. BARATH  
MORRISON & FOERSTER LLP

6 By: /s/ **Barbara Barath** [as authorized]  
Barbara Barath, Attorney for Plaintiff

7  
8 Dated: December 4, 2012

CHARLES R. SHOCKEY  
U.S. DEPARTMENT OF JUSTICE

9 By: /s/ **Charles R. Shockey**  
Charles R. Shockey, Attorney for Defendants

10 **~~PROPOSED~~ ORDER**

11  
12 PURSUANT TO STIPULATION, IT IS  
13 SO ORDERED.

BY:



14 Dated: 12/4/12

HONORABLE RICHARD SEEBORG  
U.S. DISTRICT COURT JUDGE